

**PX-0518A**

Case Clip(s) Detailed Report  
 Sunday, January 09, 2011, 1:33:21 PM

**518-A**

**0\_W3301**

---

 **Oliver, Kristy (Vol. 01) - 03/11/2010**

**1 CLIP (RUNNING 00:57:13.200)**

 Could you please state your name for the ...

**KOEDIT**

**57 SEGMENTS (RUNNING 00:57:13.200)**

**1. PAGE 6:18 TO 6:22 (RUNNING 00:00:07.000)**

18 Q Could you please state your name for the  
 19 record.  
 20 A Kristy Oliver.  
 21 Q And who are you employed by?  
 22 A Blount Memorial Hospital.

**2. PAGE 8:24 TO 9:04 (RUNNING 00:00:18.200)**

24 Q -- could you take a moment, please, to  
 25 review those 11-numbered topics on Pages 10 and 11,  
 00009:01 and the question I'll have once you've reviewed them  
 02 is whether you are prepared to testify today on  
 03 behalf of Blount Memorial Hospital regarding each of  
 04 these topics?

**3. PAGE 9:05 TO 9:07 (RUNNING 00:00:07.800)**

05 A Yes, I am. The document does refer to  
 06 Punchout, and we do not own or license or use  
 07 Punchout.

**4. PAGE 10:06 TO 10:18 (RUNNING 00:00:30.300)**

06 Q What is your current job title at Blount?  
 07 A I'm Director of Materials Management and  
 08 Home Medical Equipment.  
 09 Q And Home Medical Equipment?  
 10 A Yes.  
 11 Q And how long have you had that title?  
 12 A Five years. I've been over materials for  
 13 five years and home medical equipment for two.  
 14 Q What are the responsibilities of your  
 15 job?  
 16 A Being Director of Materials Management,  
 17 I'm over purchasing, receiving, inventory control,  
 18 print shop and OR materials coordinator as well.

**5. PAGE 11:14 TO 12:12 (RUNNING 00:01:02.500)**

14 Q What software does Blount currently  
 15 license from Lawson?  
 16 A We use -- I don't -- I'm not sure I -- I  
 17 mean, we -- our Human Resources Department, our  
 18 Accounting and Finance Department and Materials  
 19 Management use the suites of Lawson.  
 20 Q Okay. And what suite does the Materials  
 21 Management group use?  
 22 A The procurement suite with the  
 23 Requisitions Self-Service.  
 24 Q Okay. What procurement modules are  
 25 included within the supply chain management or  
 procurement suite? For example, does that include

Case Clip(s) Detailed Report  
Sunday, January 09, 2011, 1:33:21 PM

**0\_W3301**

---

02 Q Did Lawson generate a Request for  
03 Proposal when it was considering switching from the  
04 Infinium system?  
05 A Yes.  
06 Q And what companies was the Request for  
07 Proposal issued to?  
08 A McKesson, Cerner PeopleSoft and Lawson.

**9. PAGE 14:23 TO 16:08 (RUNNING 00:01:36.700)**

23 Q Were you responsible for compiling the  
24 Request for Proposal?  
25 A There was a team that put in what needs  
00015:01 we would have in the software and then our IT  
02 department compiled the RFP.  
03 Q Were you involved in generating a list of  
04 the functionality that you would need?  
05 A Yes.  
06 Q And what specific functionality were you  
07 interested in having in software that you would use  
08 for procurement?  
09 A We wanted to be paperless. We wanted  
10 inventory control to auto generate the orders based  
11 on what had been issued and received in the -- in our  
12 inventory. We wanted an Item Master List to help  
13 control costs, and we wanted a contract management  
14 system to help us manage our contracts.  
15 Q When you say an Item Master List, what  
16 are you referring to?  
17 A Items that -- that people order  
18 frequently on a frequent basis for them to be able to  
19 go in. They don't have to remember the vendor, the  
20 unit of measure that we need to order the item by.  
21 All that information is stored for them in Lawson,  
22 and they can go in there and search by several  
23 different things through the search catalog-in  
24 Requisitions Self-Service and add those items to a  
25 shopping cart and checkout and then that rolls down  
00016:01 to the purchasing folks, and they generate the  
02 purchase orders and send out the orders.  
03 Q Now you're talking about the Item Master  
04 List that's currently -- you're referring to the Item  
05 Master List that's currently in the Lawson Software?  
06 A Yes.  
07 Q That's used by Blount today?  
08 A Yes.

**10. PAGE 17:04 TO 18:03 (RUNNING 00:01:44.000)**

04 Q Do you know approximately how many items  
05 are currently in the Item Master?  
06 A I think about 8,000.  
07 Q And do you know approximately how many  
08 vendors are in the Item Master?  
09 A I do not.  
10 Q Can you give me some examples of the  
11 largest vendors that Blount uses that are in the Item  
12 Master?

Case Clip(s) Detailed Report  
Sunday, January 09, 2011, 1:33:21 PM

**0\_W3301**

---

13           A     Seneca that is our med search -- our main  
14       med search distributor that we -- we get the majority  
15       of our medical supplies through. Cardinal is a large  
16       vendor that's also in Lawson. The divisions of  
17       Johnson & Johnson, which would be Ethicon, Cordis.

18           Q     What type of information about each item  
19       is contained in the Item Master?

20           A     You have -- the ANSI format unit of  
21       measure is in there, a description of the item, the  
22       manufacturer item number if there's a separate vendor  
23       item number, the manufacturer description, and  
24       there's a -- we assign a purchasing class and an  
25       inventory class if that's applicable as well. That's  
00018:01     stored in there, and the cost of the item, and how  
02       many is in each unit of measure; for example, six in  
03       a box or ten boxes in a case.

**11. PAGE 18:04 TO 18:09 (RUNNING 00:00:11.000)**

04           Q     Do any of the items have images  
05       associated with them?

06           A     Not at this time.

07           Q     Do you intend to eventually include  
08       images in the Item Master?

09           A     Hopefully, yes.

**12. PAGE 19:08 TO 19:22 (RUNNING 00:00:51.900)**

08           Q     Now, does the system as it's configured  
09       at Blount, the Lawson Requisitions Self-Service  
10       system, include a functionality that allows a user at  
11       Blount to generate one or more purchase orders from a  
12       single requisition?

13           A     Yes.

14           Q     Does it also include a functionality that  
15       allows a user to select and search for particular  
16       items based on the item description within --

17           A     Yes. If they go into the search catalog,  
18       there's -- you can do an express search, which is  
19       just by the item number only. You have to go to the  
20       search catalog to be able to search based on either  
21       manufacturer item, description or anything like that.  
22       That is more of an advanced search.

**13. PAGE 19:23 TO 20:07 (RUNNING 00:00:24.600)**

23           Q     And within the advanced search  
24       functionality, is there the capability for a user at  
25       Blount to search both by manufacturer name and an  
00020:01     item description?

02           A     No. It would have to be one or the  
03       other. Not at the same time.

04           Q     Does it have, like, a bouillon capability  
05       of putting in a manufacturer name and then a space  
06       and then an item description so that it searches --

07           A     Not that I'm aware of.

**14. PAGE 22:25 TO 23:02 (RUNNING 00:00:05.700)**

25           Q     Okay. Does -- are there -- are you

Case Clip(s) Detailed Report  
Sunday, January 09, 2011, 1:33:21 PM

**0\_W3301**

---

00023:01       familiar with the term UNSPSC?  
02               A     No.

**15. PAGE 23:03 TO 26:16 (RUNNING 00:03:46.600)**

03               Q     Is there the capability for a user at  
04               Blount to search by category?  
05               A     Our purchasing classes and inventory  
06               classes -- how we have it categorized per my -- the  
07               example I gave with catheters, every catheter that we  
08               have in the Item Master List has a purchasing class  
09               of c-a-t-h for cath, and they can search based on  
10               that. Gloves are in there as gloves. Laboratory  
11               item are in there as lab. Urology items are in there  
12               as u-r-o.

13               Q     Okay. So you can search by category in  
14               the sense that if you type U --

15               A     Our own purchasing classes that we set up  
16               they are unique to us.

17               Q     You created your own custom made  
18               categories --

19               A     Yes.

20               Q     -- that would allow a user to search by  
21               category?

22               A     Yes.

23               Q     And what kind of assistance did Lawson  
24               provide to Blount in creating the Item Master and all  
25               the information in it?

00024:01       A     They simply provided us a template  
02               spreadsheet with the fields that Lawson would  
03               require, and then we manually built all our items  
04               during the implementation phase and then provided the  
05               spreadsheet to Lawson, and they uploaded it or  
06               downloaded.

07               Q     When you say that they -- they uploaded  
08               it, you mean Lawson uploaded it?

09               A     Yes. We had a consultant on-site during  
10               the implementation phase during particular times  
11               during implementation, and we would provide her with  
12               the information she needed, and we would send her the  
13               spreadsheet, and then she would put it in the system.

14               Q     Was that -- that was a consultant who was  
15               working here at Blount?

16               A     Yes, and she was an employee of Lawson.

17               Q     What was her name?

18               A     Katrina Rice.

19               Q     And how long was Ms. Rice on-site here at  
20               Blount?

21               A     Off and on for a seven-month period. She  
22               would come and be here for, you know, two weeks, and  
23               then be gone for two weeks while we would work on the  
24               categories that she was needing us to finish, and  
25               then she would come back.

00025:01       So it was sporadic over a seven-month  
02               period.

03               Q     Was that in the second half of 2008?

04               A     Yes. That would have been from July 2008

Case Clip(s) Detailed Report  
Sunday, January 09, 2011, 1:33:21 PM

**0\_W3301**

---

05           through January 2009.

06           Q     And can you describe for me at a high  
07        level the types of activities or assistance that  
08        Ms. Rice was providing while she was here at Blount?

09           A     Mostly providing the templates, and if we  
10      had questions as to what the field they were  
11      needing -- you know, for example, if we didn't  
12      understand what the manufacturer number was, she  
13      would explain to us the type of data that she was  
14      needing in the spreadsheet to make the Item Master  
15      List accurate.

16           She helped in testing and training as  
17      well.

18           Q     What kind of assistance did she provide  
19      with testing?

20           A     They provided us generic test scripts  
21      to -- so that we could get the test system set up and  
22      train as well.

23           Q     Did Lawson provide Blount with scripts on  
24      how to use Requisitions Self-Service?

25           A     Yes.

00026:01       Q     And did Lawson provide Blount with  
02      scripts on how to create a requisition for a  
03      particular item within Requisitions Self-Service?

04           A     Not a particular item, but how you would  
05      do it, and then we would pick one of the items we had  
06      set up, but they did not specify an item in their  
07      test script. It could be whatever item we chose to  
08      pick.

09           Q     Did the test scripts provided by Lawson  
10      include information on how to search within  
11      Requisitions Self-Service?

12           A     Yes.

13           Q     Did the test scripts provided by Lawson  
14      to Blount include information on how to generate  
15      purchase orders?

16           A     Yes.

**16. PAGE 26:17 TO 27:03 (RUNNING 00:00:40.000)**

17           Q     Did the test scripts provided by Lawson  
18      include information on searching for vendors within  
19      the Item Master?

20           A     Not -- not -- not searching for vendors  
21      within the Item Master, no, but searching for  
22      vendors -- if you were at the Requisitions  
23      Self-Service, you were doing a special item and you  
24      needed to find a vendor that you were wanting to  
25      order an item that wasn't in the Item Master List --  
00027:01       you were ordering that as a special item -- the test  
02      scripts explained how to find a vendor when you were  
03      ordering something not in the Item Master List.

**17. PAGE 27:04 TO 28:04 (RUNNING 00:01:06.500)**

04           Q     You did mention earlier that -- you  
05      testified earlier that Ms. Rice actually loaded in  
06      items into the Item Master; is that correct?

Case Clip(s) Detailed Report  
Sunday, January 09, 2011, 1:33:21 PM

**0\_W3301**

---

07           A     Yes, sir. Sorry. I nodded.  
08           Q     Thank you.  
09           Now, can you describe for me exactly what  
10          types of items she loaded into the Item Master? Was  
11          it all the information that was in the Item Master?  
12           A     Yes. Yes, all of our inventory and  
13          non-inventory items that we provided to her via the  
14          spreadsheet.  
15           Q     All of that information was loaded by  
16          Ms. Rice into the Item Master that Blount uses?  
17           A     We have -- since gone live, we have added  
18          items ourselves, but during the implementation phase  
19          the original Item Master List was set up, she did --  
20          she loaded those items, and since then, we load our  
21          own.  
22           Q     So you went live, was it, January 1st,  
23          2009?  
24           A     Yes.  
25           Q     So the day that the Item Master and  
00028:01    Requisitions Self-Service went live at Blount that  
02          Item Master and all the information in it had been  
03          loaded by Ms. Rice for Blount?  
04           A     Yes.

**18. PAGE 29:12 TO 29:19 (RUNNING 00:00:18.900)**

12           Q     Okay. Now, who makes the decisions about  
13          what non-stock items to include in the Item Master?  
14           A     I do, in addition to our contract and  
15          license purchasing manager based on the frequency of  
16          ordering.  
17           If we see an item is being ordered  
18          frequently, we try to get that item added into our  
19          Item Master List.

**19. PAGE 34:06 TO 34:08 (RUNNING 00:00:10.000)**

06           Q     Can users at Blount create requisitions  
07          through the requisitions module?  
08           A     No.

**20. PAGE 34:09 TO 34:15 (RUNNING 00:00:13.000)**

09           Q     So the only way that a user at Blount can  
10          create a requisition is through the Requisitions  
11          Self-Service module?  
12           A     Yes. The only people that have access to  
13          the standard Requisition module is the purchasing  
14          agent, but we never use it, but we do have access to  
15          it if needed.

**21. PAGE 35:12 TO 35:15 (RUNNING 00:00:12.900)**

12           Q     Does the Item Master that Blount  
13          maintains include generally equivalent items like,  
14          for example, similar catheters that are available  
15          from different vendors?

## **Case Clip(s) Detailed Report**

Sunday, January 09, 2011, 1:33:21 PM

0\_W3301

**22. PAGE 35:18 TO 35:18 (RUNNING 00:00:00.500)**

18 THE WITNESS: Yes.

**23. PAGE 36:20 TO 37:11 (RUNNING 00:00:50.000)**

20 Q And you mentioned that you viewed demos  
21 of the system?

22 A Yes.

23 Q In what form was that demo provided to  
24 you from Lawson?

25 A They came on-site and showed us the demo  
00037:01 of the system. I assume they were logged in via the  
02 Internet to show us test demo systems.

Q After you informed Lawson that you were interested in purchasing their software, what was the next step in the process of actually signing a final contract?

07                   A         Contract negotiation for pricing, legal  
08         review of the verbiage in the contract, and then  
09         establishing a timeline for the implementation and  
10         determining the Lawson consultants that would be  
11         coming on-site.

**24. PAGE 37:23 TO 38:24 (RUNNING 00:01:18.600)**

23 Q Who was Ms. Rice's primary contact here  
24 at Blount? Who was she working with at Blount?

25 A Me.

00038:01 Q And what kind of interaction did you have  
02 with her?

03 In other words, what kind of work were  
04 you guys involved with during those seven months that  
05 she was present here?

06                   A     Going back to the spreadsheets that I  
07 referred to earlier, making sure that the data was  
08 loaded correctly in those and that, you know, we were  
09 meeting the needs that -- and providing the  
10 information for the required fields that Lawson has  
11 and then testing once that information was loaded in  
12 the system.

Q In addition to licensing software from Lawson, did Blount also agree to any sort of maintenance or sign a contract so that Lawson would provide maintenance for that software?

17 A Yes.

Q And what kind of maintenance does Lawson provide to Blount for the software it licensed?

20                   A         They provide technical support. They  
21                   also provide -- they will log-in to our servers and  
22                   load our patches and help -- you know, help with any  
23                   problems that we have through our service and  
24                   maintenance agreement with them.

**25. PAGE 38:25 TO 39:10 (RUNNING 00:00:29.000)**

25 Q Do you have any assistance on-site from  
00039:01 Lawson consultants?

02 A No.

Case Clip(s) Detailed Report  
Sunday, January 09, 2011, 1:33:21 PM

**0\_W3301**

---

**27. PAGE 42:07 TO 43:15 (RUNNING 00:01:26.000)**

07 Q And who trained you on those test scripts  
08 that were provided by Lawson?  
09 A Katrina.  
10 Q And she also trained the other Super  
11 Users you called them?  
12 A Yes.  
13 Q Are they called Super Users because they  
14 are frequent users of the system?  
15 A Yes, and we trained the trainer. She  
16 trained us, and we trained everybody else.  
17 Q So she's the original trainer?  
18 A Yes.  
19 Q She trains you, and then you train --  
20 A All 700 through -- all the rest of them.  
21 Q How many people have access to the  
22 Requisitions Self-Service system at Blount?  
23 A I think we have -- we have about 600  
24 approved requisition users.  
25 Q So I assume that not all those people are  
00043:01 in the Materials Management group?  
02 A No.  
03 Q What other groups of employees at Blount  
04 have access to Requisitions Self-Service?  
05 A Each department will have anywhere from  
06 one to, you know, ten people even -- that have access  
07 to do ordering for their area. All the nurses -- I  
08 say that. Most of the nurses have access to be able  
09 to go in and order items. Some of our nursing  
10 requisitioners can just order from our inventory  
11 storeroom. They don't have access to order any  
12 non-stock items direct or any special items that  
13 aren't in the Item Master List. That depends on how  
14 their record is set up in Lawson for what they --  
15 their -- they can do.

**28. PAGE 44:15 TO 44:21 (RUNNING 00:00:21.800)**

15 Q Okay. Could you turn, please, to B-17.

 PX0225-0013 - PX0225-0013

16 Do you see there's a document entitled here scenario  
17 log for configuration acceptance testing?  
18 A Yes.  
19 Q And handwritten at the bottom it says  
20 Lawson test scripts?  
21 A Yes.

**29. PAGE 46:20 TO 47:04 (RUNNING 00:00:17.000)**

20 Q Okay. Now the create requisition through  
21 RSS is that a script that describes how to create  
22 requisitions through Requisitions Self-Service?  
23 A Yes.  
24 Q And that's a test script that was  
25 provided by Lawson to Blount?  
00047:01 A Yes.

Case Clip(s) Detailed Report  
Sunday, January 09, 2011, 1:33:21 PM

**0\_W3301**

---

11           A     Yes.  
12           Q     Is this a list, to your understanding, of  
13       the requirements that -- the requirements that Blount  
14       had included in its Request for Proposal, and then  
15       the chart next to each requirement indicates whether  
16       Lawson is capable of fulfilling that requirement?  
17           A     Yes.  
18           Q     Okay. If you turn to page L83406, it's

**PX0226-0048 - PX0226-0048**

19       Page 41 of the document. Do you see under the  
20       section requisitioning there is number ten at the  
21       bottom of the page?  
22           A     Yes.  
23           Q     And it states: Allows users to place  
24       stock, non-stock and non-catalog items from multiple  
25       sources on one requisition?  
00054:01       A     Yes.  
02           Q     Was that a functional requirement in the  
03       Request for Proposal that Blount issued to Lawson?  
04           A     Yes.

**37. PAGE 54:05 TO 54:17 (RUNNING 00:00:45.100)**

05           Q     And is that a function that's included in  
06       the software that Lawson provided to Blount?  
07           A     No -- I mean, we don't allow them to go  
08       out to a vendor catalog. The source is -- they can  
09       order stock and non-stock and put it on the same  
10       requisition, but it all has to come from our Item  
11       Master List or a direct, but they could still put --  
12       or a special, maybe even something that's not in our  
13       Item Master List. They could still put an inventory  
14       item, a non-stock item that's in the Item Master List  
15       as well as a special item that is not in the Item  
16       Master List all those -- all three could be on one  
17       requisition.

**38. PAGE 54:18 TO 54:24 (RUNNING 00:00:23.900)**

18           Q     So to clarify, a user at Blount using  
19       Lawson's Requisitions Self-Service can create a  
20       requisition for multiple non-stock items that are  
21       generally equivalent yet come from different vendors  
22       and then create -- and create purchase order from  
23       that one requisition?  
24           A     Yes.

**39. PAGE 56:22 TO 57:21 (RUNNING 00:01:35.000)**

22           Q     Can you take a look, please, at Page 51.

**PX0226-0058 - PX0226-0058**

23       Functional requirement four.  
24           A     Yes.  
25           Q     It says: Quote, manages price catalogs,  
00057:01       purchase orders, purchase order confirmations and  
02       invoice transactions. Can you describe for me what